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UNITED STATES DISTRICT COURT SOUTH DAKOTA
RAPID CITY DIVISION

Holli Telford)

Plaintiffs)

Ron A. Bradeen, Bradeen)
Real Estate, Jeff Storm, Jim Bultsma)
Jim Ashmore, Southern Hills Title)
Company, Morningside Properties LLP;)
Heartland Real Estate; Verylis R. Boyd,)
Warner C. Boyd, Fall River County)
Sheriff Robert Evans an SA Dane)
Rasmussen in their official capacities)

Defendants

FILED

JAN 24 2018

Civil No. 17- 5042

Matthew Thiel
CLERK

**REQUEST TO TAKE JUDICIAL
NOTICE OF FORGED AND
BACK DATED DEED IN THIS
ACTION**

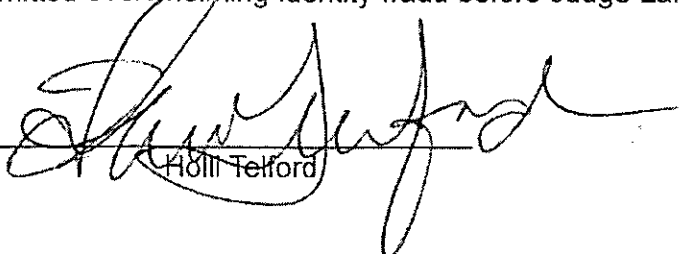
Plaintiffs hereby request that this court take judicial notice of the back dated and forged DEED that the defendants file in this action plus other undisputed facts supporting Plaintiffs fraud claims against the defendants. The following facts are undisputed by the attached record.

1. The deed bears a signature date of the owners of December 6, 2016.
2. The Deed was notarized by a notary whose notarial jurat was EXPIRED TWO MONTHS BEFORE the DEED was executed by the owners Verylis Boyd and Warner Boyd through their attorney Gerald Baldwin; thus making the deed VOID as a matter of law.
3. The DEED was recorded with the Fall River County Register of Deeds three weeks AFTER this action was filed and three weeks AFTER Judge Roberto Lange dismissed USDC case no. 16-CV-3033 for lack of venue in the state of South Dakota and threatened Plaintiffs with a felony fictitious address charge 18 USC 1342 on May 1. 2017.
4. The attorney preparing the deed works with Southern Hills Title Company and had prepared the deed allegedly while Souther Hills Title company was the escrow agent on

this transaction.

5. Southern Hills attorney in this action represented CENTURYLINK in the action before Judge Lange's court and committed overwhelming identity fraud before Judge Lange's court.

Dated: January 23, 2018



Holly Telford

Certificate of Service

The above signed verifies that this document will be placed into the court's ecf filing systems and served on all parties.

Filed for Record - Fall River County

Filed On 5/24/2017 3:50 PM
Document# R 055609 Type: DEED-WAR

Prepared By:
Gerald M. Baldwin
Attorney at Law
Box 31
Custer, SD 57730
605-673-3331

BOOK 142 of DEEDS
PAGE 935 through 936 #ofPages

Melody Engebretson, Register of Deeds
Fee \$ 30.00 CK.

Transfer Fee \$ 2.50 Key# 87461

055609



WARRANTY DEED

MORNINGSIDE PROPERTIES, LLP, a South Dakota Limited Liability Partnership,
of PO Box 1108, Mitchell, SD 57301, GRANTOR for and in consideration of One Dollar
and other valuable consideration GRANTS, CONVEYS, and WARRANTS to HOLLIE
TELFORD and BRENDA BURTON, as joint tenants with right of survivorship and not as
tenants in common, of 229 N. Pine St., Gordon, NE 69343, GRANTEES, the following
described real estate in the County of Fall River and the State of South Dakota:

Lots 3, 4, 5, and 6 in Block 63, Town of Oelrichs, Fall River County, South Dakota.

INCLUDING:

- A. All oil, gas and mineral estate held by Grantor.
- B. Any interest in rights-of-way or easements reserved or established on other properties, providing access to the demised premises.

SUBJECT TO THE FOLLOWING:

- A. Exceptions and reservations contained in the United States Patent and all prior valid exceptions and reservations of oil, gas and minerals.
- B. Highway and public utility rights-of-way and easements as described, platted, or established by prescription.
- C. Covenants, restrictions and reservations of record, if any, providing that the same are not violated by the existing improvements or the use thereof.

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- D. Any zoning, building or land use regulations, of whatever nature or kind, of any governmental body, law or statute, or violations thereof, that may be applicable to or affecting the real premises herein being sold.
- E. Current taxes not delinquent.

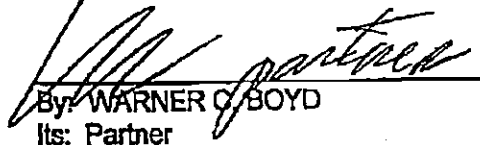
Transfer Fee
\$2.50

Dated this 6th day of December, 2016.

GRANTOR: MORNINGSIDE PROPERTIES, LLP



By: VERYLIS R. BOYD
Its: Partner



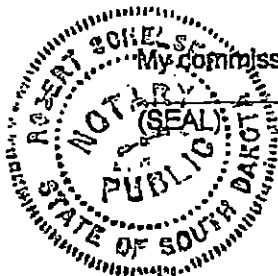
By: WARNER C. BOYD
Its: Partner

STATE OF SOUTH DAKOTA)
IN THE COUNTY OF Davison) SS

On this the 6th day of December, 2016, before me, the undersigned officer, personally appeared VERYLIS R. BOYD and WARNER C. BOYD, who acknowledged themselves to be partners of MORNINGSIDE PROPERTIES, LLP, a South Dakota Limited Liability Partnership, and that they, as such partners, being authorized so to do, executed the foregoing instrument for the purposes therein contained, by signing the name of the partnership by themselves as partners.

IN WITNESS WHEREOF I hereunto set my hand and official seal.


Notary Public,



My commission expires: 10-21-16

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1 Q. And is it then taken from the network folder and put
2 in the right slot for a case?

3 A. Then it would be filed in CM/ECF in that case. Yes.

4 THE COURT: Perhaps we should explain on the
5 record the acronym CM/ECF.

6 THE WITNESS: CM/ECF is an acronym for Case
7 Management Electronic Case Files.

8 MR. BERNARD: Okay. Thank you, Your Honor.

9 Q. BY MR. BERNARD: And is it always you who, after
10 scanning it, puts it into the electronic system?

11 A. The person who takes the document at the counter
12 scans it and puts it in a folder. And then whoever is
13 responsible for that folder would put it in CM/ECF. Not
14 necessarily the same person.

15 Q. Okay. And my knowledge of the electronic system is
16 that when it's put into that system, it puts a stamp at
17 the top?

18 A. Yes.

19 Q. Does the stamp reflect the day in which the document
20 was delivered to the clerk by hand?

21 A. Not -- I think -- I'm not sure what we're talking
22 about. When a document is filed in CM/ECF, the system
23 will put a header on the document that has a date on it of
24 when it was put into CM/ECF. When a document is taken
25 over the counter sometimes it's stamped with a "filed"

1 stamp, with a date on it. It doesn't have a time, I don't
2 believe.

3 Q. Okay. And what I'm referring to is the electronic
4 stamp at the top that the electronic system puts on it.

5 A. We call that a header. But yes.

6 Q. Okay. The header. Does the header reflect the day
7 that the document was handed to the clerk?

8 A. No. It reflects the time it was put into CM/ECF.

9 Normally it does reflect when we got it over the counter,
10 yes. But it's derived from when it was put into the
11 system.

12 Q. Okay. I'm having a hard time understanding. How do
13 we know that if I walk in on the last day to file a
14 document, that it was actually hand-delivered to you that
15 day?

16 A. It should be -- they should both be the same.

17 Q. That is the header and the data line?

18 A. Yes.

19 THE COURT: Ms. Thielen, the question that I
20 need to have an answer to is when a person comes and
21 provides a document for filing over the counter, you said
22 it may be stamped mechanically. But is it then filed in
23 CM/ECF that day so the header would appear on it?

24 THE WITNESS: It isn't necessarily filed on the
25 same day. But if it isn't -- if we get something late in